

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>BRUCE L. LEBITZ</b>	)	<b>CHAPTER 13</b>
<b>HEIDI L. LEBITZ</b>	)	
<b>DEBTORS</b>	)	
	)	<b>CASE NO. 1:21-bk-02417-HWV</b>
<b>MIDFIRST BANK</b>	)	
<b>Movant</b>	)	
	)	
<b>BRUCE L. LEBITZ</b>	)	
<b>HEIDI L. LEBITZ</b>	)	
	)	
<b>JACK N. ZAHAROPOULOS, TRUSTEE</b>	)	
<b>Debtor/Respondent</b>	)	

**DEBTORS' RESPONSE TO MIDFIRST BANK'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001**

1. Movant, Midfirst Bank, filed its Motion for Relief from Stay on November 9, 2022.
2. Debtors acknowledge some mortgage payments are past due.
3. Debtors desire the opportunity to cure any post-petition mortgage arrears and keep their home.
4. Debtors requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtors Bruce L. Lebitz and Heidi L. Lebitz, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed November 9, 2022 by Midfirst Bank.

Dated: November 15, 2022

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